

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	
Parenti & Raffaelli, Ltd.)	NOTICE OF VIOLATION
Mount Prospect, Illinois)	
)	EPA-5-01-IL-06
Proceeding Pursuant to)	
Section 113(a)(1) of the)	
Clean Air Act,)	
42 U.S.C. § 7413(a)(1))	

NOTICE OF VIOLATION

The Administrator of the United States Environmental Protection Agency (U.S. EPA), by authority duly delegated to the undersigned, is issuing this Notice of Violation pursuant to Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. § 7413 (a)(1). U.S. EPA hereby notifies the State of Illinois and Parenti & Raffaelli, Ltd, (Parenti) that U.S. EPA finds that Parenti, located at 215 E. Prospect Avenue, Mount Prospect, Illinois, is in violation of the Illinois State Implementation Plan (Illinois SIP), as follows:

Statutory and Regulatory Background

1. The State of Illinois amended the Wood Furniture Coating Rules effective February 2, 1998. 22 Ill. Reg. 3556. On March 6, 1998, the State of Illinois submitted the amended Rules to U.S. EPA as a requested revision of the Illinois SIP for ozone. On May 19, 1998, U.S. EPA approved the Illinois SIP revision, making the amended Wood Furniture Coating Rules federally enforceable, effective July 20, 1998. 63 Fed. Reg. 27489.
2. 35 Ill. Admin. Code, Part 218.204 (1)(2)(A) sets forth the emission limitations for wood furniture coaters, specifying that no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the emission limitations for the specified coating. On and after July 20, 1998, wood furniture topcoats must comply with the emission limitation of 0.8 lb VOM/lb solid.

3. 35 Ill. Admin. Code, Part 218.204 (l)(B)(i) sets forth the emission limitations for wood furniture coaters, specifying that no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the emission limitations for the specified coating. On and after July 20, 1998, wood furniture non-acid-cured alkyd amino vinyl sealers must comply with the emission limitation of 1.9 lb VOM/lb solids.
4. 35 Ill. Admin. Code, Part 218.211 (c)(2) specifies that on or after July 20, 1998, the owner or operator of a subject coating line shall collect and record the weight of VOM per weight of solids and certified product data sheets for each coating as applied, each day on each coating line.

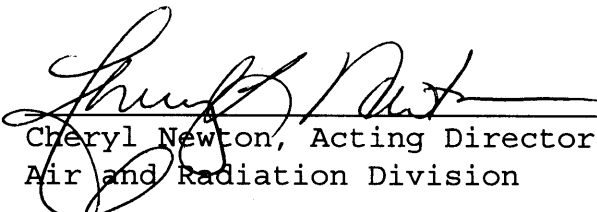
Factual Background

5. Parenti owns and operates a wood office furniture manufacturing facility located at 215 E. Prospect Avenue, Mount Prospect, Illinois. Parenti is located in Cook County, Illinois, an area classified as non-attainment for ozone.
6. On and after July 20, 1998, Parenti used four different topcoats. Topcoat No. 421-4015 has a VOM content of 0.86 lb VOM/lb solid; Topcoat No. 421-4030 has a VOM content of 0.88 lb VOM/lb solid; Topcoat No. 421-4240 has a VOM content of 1.23 lb VOM/lb solid; and, Topcoat No. 421-1212 has a VOM content of 2.00 lb VOM/lb solid.
7. On and after July 20, 1998, Parenti used two non-acid-cured alkyd amino vinyl sealers (Code nos: 154056 and T67F3) having a VOM content of 2.08 lb VOM/lb solid and 3.17 lb VOM/lb solid, respectively.
8. On and after July 20, 1998, Parenti did not collect and record the weight of VOM per weight of solids and certified product data sheets for each coating as applied, each day on each coating line.

Finding of Violation

9. Parenti's use of the topcoats with a VOM content greater than 0.8 lb VOM/lb solid after July 20, 1998 is a violation of the emission limitations for wood furniture coaters at 35 Ill. Admin. Code 218.204.
10. Parenti's use of the non-acid-cured alkyd amino vinyl sealers with a VOM content greater than 1.9 lb VOM/lb solid on and after July 20, 1998, is a violation of the emission limitations for wood furniture coaters at 35 Ill. Admin. Code 218.204.
11. Parenti's failure to collect certified product data sheets for each coating, and to record the weight of VOM per weight of solid for each coating as applied, each day on each coating line is a violation of 35 Ill. Admin. Code, Part 218.211 (c) (2).

3/1/01
Date


Cheryl Newton, Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice of Violation, issued pursuant to the Clean Air Act, by Certified Mail, Return Receipt Requested, to:

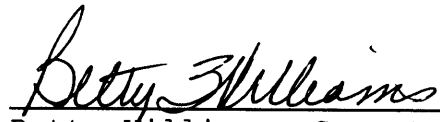
Robert Parenti, President
Parenti & Raffaeli, Ltd.
215 East Prospect Avenue
Mount Prospect, Illinois 60056

I also certify that I sent copies of the Notice of Violation by first class mail to:

Julie Armitage, Acting Section Manager
Compliance and Systems Management Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue
Springfield, Illinois 62702

Harish Narayan, Acting Regional Manager
Illinois Environmental Protection Agency
Region 1
9511 W. Harrison Street
Des Plaines, Illinois 60016

on the 2nd day of March, 2001.


Betty Williams, Secretary
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7099 3400 0000 9591 9874